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Attorneys for Defendants

Rimini Street, Inc., and Seth Ravin

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;
ORACLE AMERICA, INC., a Delaware
corporation; and ORACLE INTERNATIONAL
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;
SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-PAL

**DECLARATION OF ROBERT H.
RECKERS IN SUPPORT OF
DEFENDANTS RIMINI STREET
INC.'S AND SETH RAVIN'S MOTION
TO PRECLUDE CERTAIN DAMAGES
EVIDENCE PURSUANT TO FEDERAL
RULES OF CIVIL PROCEDURE 26(E)
AND 37(C)**

Date:

Time:

Place:

Judge: Hon. Larry R. Hicks

DECLARATION OF ROBERT H. RECKERS

I, Robert H. Reckers, have personal knowledge of the facts stated below and, under penalty of perjury, hereby declare:

1. I am an attorney admitted to practice *pro hac vice* before this Court in the above captioned matter, and an attorney at Shook, Hardy, and Bacon LLP, attorneys for Defendants Rimini Street, Inc. and Seth Ravin, (“Defendant”). I make this declaration in support of Defendant’s Motion to Preclude Certain Damages Evidence Pursuant to Federal Rules of Civil Procedure 26(e) and 37(c) on May, 18 2015. The Exhibits referenced below are all attached to this Declaration. These Exhibits are all true and correct copies from correspondence exchanged between the parties, or from discovery exchanged between the parties.

2. Attached to this Declaration as **Exhibit A** is a true and accurate copy of the February 25, 2014 letter from Geoff M. Howard to Robert H. Reckers.

3. Attached to this Declaration as **Exhibit B** is a true and accurate copy of the March 10, 2014 letter from Robert H. Reckers to Geoff Howard.

4. Attached to this Declaration as **Exhibit C** is a true and accurate copy of the April 3, 2014 letter from Robert H. Reckers to Geoff Howard, and attached supplemental discovery responses.

5. Attached to this Declaration as **Exhibit D** is a true and accurate copy of the April 11, 2014 letter from Thomas S. Hixson to Robert H. Reckers.

6. Attached to this Declaration as **Exhibit E** is a true and accurate copy of the June 6, 2014 letter from Ryan Dykal to Thomas S. Hixson.

7. Attached to this Declaration as **Exhibit F** is a true and accurate copy of the June 20, 2014 letter from Nitin Jindal to Ryan Dykal.

8. Attached to this Declaration as **Exhibit G** is a true and accurate copy of the July 8, 2014 letter from Zachary Hill to Ryan Dykal.

9. Attached to this Declaration as **Exhibit H** is a true and accurate copy of the August 8, 2014 letter from Nitin Jindal to Ryan Dykal.

1 10. Attached to this Declaration as **Exhibit I** is a true and accurate copy of the
2 August 20, 2014 email from Robert H. Reckers to Thomas S. Hixson and Kieran Ringgenberg.

3 11. Attached to this Declaration as **Exhibit J** is a true and accurate copy of the
4 August 20, 2014 letter from Robert H. Reckers to Thomas S. Hixson.

5 12. Attached to this Declaration as **Exhibit K** is a true and accurate copy of
6 August 29, 2014 letter from David J. Niegowski to Thomas S. Hixson and Nitin Jindal.

7 13. Attached to this Declaration as **Exhibit L** is a true and accurate copy of the
8 transcript Case Management Conference held on October 9, 2014.

9 14. Attached to this Declaration as **Exhibit M** is a true and accurate copy of cited
10 excerpts from the Expert Report of Elizabeth A. Dean (served Jan. 17, 2012).

11 I declare under penalty of perjury under the laws of the United States that the
12 foregoing is true and correct.

13
14 Executed on May 18, 2015

/s/ Robert H. Reckers
Robert H. Reckers, Esq.